

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MICHELLE CHRISTIAN,

Plaintiff,

v.

OMNIS GLOBAL TECHNOLOGIES, LLC;  
OMNIS BUILDING TECHNOLOGIES, LLC;  
OBT BLUEFIELD, LLC; OMNIS FUEL  
TECHNOLOGIES LLC D/B/A OMNIGEN;  
AND OMNIS SUBLIMATION RECOVERY  
TECHNOLOGIES, LLC,

Defendants.

Civil Action No. 2:24-cv-01319

**STIPULATION TO WITHDRAW COUNTERCLAIM, FILE AMENDED COMPLAINT,  
AND ANSWER OR OTHERWISE MOVE**

Plaintiff Michelle Christian (“Plaintiff”) and Defendants Omnis Global Technologies, LLC; Omnis Building Technologies, LLC; OBT Bluefield, LLC; Omnis Fuel Technologies, LLC D/B/A Omnigen; and Omnis Sublimation Recovery Technologies, LLC (collectively, “Defendants”) hereby state the following:

1. Plaintiff filed a Complaint on March 28, 2024 (ECF No. 1);
2. Defendants filed a Motion to Dismiss on May 28, 2024 (ECF No. 10);
3. Defendants filed a Counterclaim on October 15, 2024 (ECF No. 20);
4. Pursuant to the policies and procedures of the Honorable Mia Roberts Perez, the parties met and conferred about Plaintiff’s anticipated motion to dismiss Defendants’ Counterclaim;
5. The parties hereby stipulate and agree:
  - a. Defendants will withdraw their Counterclaim without prejudice;

b. Plaintiff will file an Amended Complaint to assert claims under the Pennsylvania Human Relations Act, and Defendants waive any arguments that such claims are not ripe;

c. Defendants will answer or otherwise move to Plaintiff's Amended Complaint and will file a Counterclaim; and

d. Plaintiff will respond to any newly filed Counterclaim pursuant to the Federal Rules.

**SO STIPULATED AND AGREED:**

/s/ Christine E. Burke

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Dated: October 29, 2024

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Attorneys for Defendants

**SO ORDERED:**

Mia Roberts Perez, U.S.D.J.

Dated:

**CERTIFICATE OF SERVICE**

I certify that on this 29th day of October 2024, the foregoing Stipulation was filed using the Eastern District of Pennsylvania's ECF system, through which this document is available for viewing and downloading, causing a notice of electronic filing to be served upon the following counsel of record:

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/s/Matthew J. Hank  
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